

2018-2-E
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VIA HAND DELIVERY

The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
1231 Gervais Street
Columbia, South Carolina 29201

Re: *South Carolina Coastal Conservation League, et al. v. South Carolina
Public Service Commission, et al.*; Appellate Case No. 2018-001165

*South Carolina Solar Business Alliance, LLC, v. South Carolina Coastal
Conservation League, et al.*; Appellate Case No. 2018-002117

Dear Mr. Shearouse:

On behalf of South Carolina Electric & Gas Company, enclosed for filing, please find the original and six (6) copies of a Motion To Consolidate. You will also find enclosed our check in the amount of \$25.00 for the filing fee.

Please acknowledge receipt of the enclosed documents by file stamping the extra copy of same and returning it to me via my courier.

If you have any questions or need additional information, please do not hesitate to contact me.

[SIGNATURE PAGE FOLLOWS]

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MAIL / DMS

The Honorable Daniel E. Shearouse
December 14, 2018
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Very truly yours,

WILLOUGHBY & HOEFER, P.A.



Benjamin P. Mustian

BPM/cgc
enclosures

cc: Alexander G. Shissias, Esquire
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The Honorable Jocelyn Boyd, Clerk for the SC Public Service Commission

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Appellate Case Nos. 2018-001165 and 2018-002117

Commission Docket No. 2018-2-E

South Carolina Coastal Conservation League and
Southern Alliance for Clean Energy, Appellants,

v.

South Carolina Public Service Commission, South Carolina
Electric & Gas Company, CMC Steel South Carolina, South
Carolina Energy Users Committee, South Carolina Solar
Business Alliance, LLC, Southern Current, LLC, and South
Carolina Office of Regulatory Staff, Respondents;

and

South Carolina Solar Business Alliance, LLC, Appellants,

v.

South Carolina Coastal Conservation League, Southern Alliance for Clean
Energy, South Carolina Public Service Commission, South Carolina
Electric & Gas Company, CMC Steel South Carolina, South Carolina
Energy Users Committee, Southern Current, LLC, and South Carolina Office
of Regulatory Staff,

Of whom, South Carolina Electric & Gas Company and South Carolina
Office of Regulatory Staff are Respondents.

MOTION TO CONSOLIDATE

Respondent South Carolina Electric & Gas Company ("SCE&G"), pursuant to Rule 214, SCACR, moves this Court to consolidate the above-referenced appeals. Both matters seek this Court's review of similar questions regarding the same orders issued by the Public Service Commission of South Carolina ("Commission"). In addition, both appeals are from the same underlying regulatory proceedings conducted by the Commission pursuant to S.C. Code Ann. §§ 58-27-865 and 58-39-140 (2015) on an annual review of the fuel purchasing practices and policies of SCE&G. Accordingly, consolidation of these matters is appropriate and warranted because it will avoid the need for duplicative briefing, thereby furthering the interests of judicial economy.

Counsel for SCE&G also has consulted with the other parties of record to these appeals and is advised that the South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, South Carolina Solar Business Alliance, LLC, Southern Current, LLC, the South Carolina Energy Users Committee, and the South Carolina Office of Regulatory Staff consent to the consolidation of these matters. CMC Steel South Carolina also has advised that they take no position on the consolidation of these matters.

WHEREFORE, having fully set forth its motion, SCE&G moves the Court to issue an order consolidating Appellate Case Nos. 2018-001165 and 2018-002117. SCE&G further moves the Court to grant such other and further relief as may be just and proper.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

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Columbia, South Carolina
December 14, 2018

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In The Supreme Court

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South Carolina Coastal Conservation League, Southern Alliance for Clean
Energy, South Carolina Public Service Commission, South Carolina
Electric & Gas Company, CMC Steel South Carolina, South Carolina
Energy Users Committee, Southern Current, LLC, and South Carolina Office
of Regulatory Staff,

Of whom, South Carolina Electric & Gas Company and South Carolina
Office of Regulatory Staff are Respondents.

CERTIFICATE OF SERVICE

This is to certify that I, a Legal Assistant with the law firm Willoughby & Hoefer, P.A., have caused to be served this day one (1) copy of Respondent South Carolina Electric & Gas Company's **Motion To Consolidate** by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

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The Honorable Jocelyn Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210
(Clerk for South Carolina Public Service Commission)


Cathy G. Caldwell

Columbia, South Carolina
This 14th day of December, 2018.